

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Zoom Deposition of:

MICHELLE FOREMAN

Taken on behalf of the Plaintiffs

January 29, 2021

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**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

RACHAEL ANNE ELROD, ANDREW)
KAUFMAN, SARAH MARTIN, and BROOKS)
BRASFIELD, on behalf of themselves and all)
others similarly situated,)
Plaintiffs,)
v.)
Magistrate Judge Barbara D.)
Holmes)
NO TAX 4 NASH, MICHELLE FOREMAN,)
And JOHN DOES 1-10)
Defendants.)
CLASS ACTION)
JURY TRIAL DEMANDED)
No. 3:20cv00617)
District Judge Eli J. Richardson)

DEFENDANT'S RULE 26(a) INITIAL DISCLOSURES

COMES the Defendant, Michelle Foreman, by and through counsel, and hereby submits the following disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

1. Fed. R. Civ. P. 26(a)(1)(A):

(i) The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information- that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

⋮

Name	Point of Contact	Knowledge
Michelle Foreman	This witness may be contacted through Defendant's counsel	
Heather Sellers Best Sellers, LLC	Telephone Number: 334-657-6850 Address: 313 Red Eage Circle Ridgeland, MS 39157 Address: 973A South Rolfe Street Arlington, VA 22204 Email: heather@bestsellersco.org	Knowledge of calls made

EXHIBIT

Foreman 1

exhibitsticker.com

Joe Gregory	Telephone Number: 614-800-3013	Knowledge of calls made
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2. **Fed. R. Civ. P. 26(a)(1)(B):**

(ii) A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;

RESPONSE:

Name of Document/ Information	Category Description
Media Plan by Heather Sellers	PDF Slideshow
Invoice prepared for No Tax 4 Nash by Heather Sellers	PDF
Heather Sellers business card	PDF

3. **Fed. R. Civ. P. 26(a)(1)(B)(IV):**

(iii) A computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered;

RESPONSE: None.

4. **Fed. R. Civ. P. 26(a)(2):**

(iv) For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE: None.

5. Initial Case Management Order

(a) Defendant shall identify any other persons and/or entities who are or may be legally responsible for the calls at issue in this action.

RESPONSE: Best Sellers, LLC

6. Initial Case Management Order

(b) Defendant shall produce all documents, communications, and agreements with Best Sellers, LLC relating to the calls at issue in this action.

RESPONSE:

Name of Document/ Information	Category Description
Media Plan by Heather Sellers	PDF Slideshow
Invoice prepared for No Tax 4 Nash by Heather Sellers	PDF
Heather Sellers business card	PDF

7. Initial Case Management Order

(c) Defendant shall produce any lists of telephone numbers, calling data or other information provided to Best Sellers, LLC, describing the actual or intended recipients of the calls at issue in this action.

RESPONSE: Defendant is attaching the Voter Registration Database

Respectfully submitted,

/s/ G. Kline Preston, IV
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was sent via email and US mail, postage prepaid, this 3rd day of November, 2020 to:

Mr. John Spragens, Esq.
Spragens Law, PLC
311 22nd Avenue North
Nashville, TN 37203

/s/ G. Kline Preston, IV
G. Kline Preston, IV